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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

*In re: Volkswagen 'Clean Diesel' Marketing,  
Sales Practices, and Products Liability  
Litigation*

This document relates to:

*Iconic Motors, Inc., et al. v. Volkswagen  
Group of America, Inc., et al.*, No. 3:17-cv-  
3185-CRB

LEAD CASE No. 15-md-02672-CRB

**BOSCH DEFENDANTS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED**

Hon. Charles R. Breyer

1 Pursuant to Local Civil Rule 79-5(d)-(f), Robert Bosch GmbH and Robert Bosch LLC  
2 (together, the “Bosch Defendants”) seek leave to file under seal portions of their Reply in Support  
3 of Motion for Summary Judgment (“Brief”).

4 The Brief contains information from documents Plaintiffs have designated “Confidential”  
5 under the Stipulated Protective Order Governing Individual Dealer Actions, ECF No. 5180  
6 (“Protective Order”). Paragraph 12.3 of the Protective Order prohibits the Bosch Defendants  
7 from filing this information publicly without written permission from the designating party. The  
8 Bosch Defendants therefore respectfully seek leave to file these materials under seal to permit  
9 Plaintiffs the opportunity to justify continued sealing under Local Civil Rules 79-5(c) & (f)(3).  
10

11 Dated: March 21, 2025

12 By: /s/ Carmine D. Boccuzzi, Jr.  
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**Certificate of Service**

**[28 U.S.C. §1746]**

Re: Iconic Motors, Inc., et al. v. Volkswagen Group of America, Inc., et al.

I, Clay McKeon, Senior Docket Clerk in the Washington, DC office of Cleary Gottlieb Steen & Hamilton LLP, declare that I served the following document(s) by email on counsel listed below:

- Robert Bosch GmbH and Robert Bosch LLC's Reply in Support of Motion for Summary Judgment

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*Counsel for Iconic Motors, Inc. and Slevin Capital Investments, Inc.*

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 21, 2025 in Washington, DC.

Dated: March 21, 2025

  
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Clay McKeon